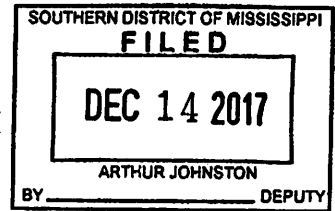


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OFNOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

**DEFENDANT CHARLES LEARY'S
PRO SE MOTION FOR PARTIAL SUMMARY JUDGMENT UNDER 11 U.S.C.
362(K) AND FOR COPYRIGHT INFRINGEMENT, REQUEST FOR
INJUNCTIVE RELIEF**

COMES NOW Defendant and Plaintiff by counterclaim **Charles Leary**, appearing *pro se*, and files this his Motion for partial summary judgment (Fed.R.Civ.P. 56), and would show that there is no question of fact or law that Defendant by counterclaim Handshoe violated an 11 U.S.C. § 362(a) bankruptcy stay, and should be punished under 11 U.S.C. § 362(k). In addition, there is no question of fact or law that Mr. Handshoe infringed copyright in four photographic works as claimed in Leary's first amended counterclaim, and has recently judicially admitted to infringing copyright in a fifth photographic work. Dr. Leary seeks an injunction ordering Mr. Handshoe to immediately cease infringement and to turn over to Leary all copies of the works.

Defendant Leary respectfully also moves this Court for such general relief as the Court deems appropriate in the premises.

RESPECTFULLY SUBMITTED, this the 12th day of December, 2017.


CHARLES LEARY, DEFENDANT
appearing *pro se*

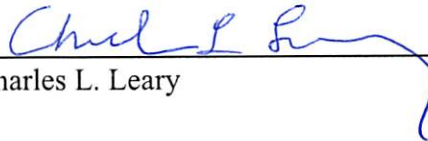
308 5th Ave E
Vancouver, BC V5T 1H4
Canada

(902) 482-8360
foodvacation@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that, on DECEMBER^{12,} 2017, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]


Charles L. Leary